

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO as representative of**

**THE COMMONWEALTH OF PUERTO
RICO, THE EMPLOYEES RETIREMENT
SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO,
AND THE PUBLIC BUILDINGS
AUTHORITY**

*Debtors*¹

PROMESA

Title III

Case No. 17 BK 3283 – LTS
(Jointly Administered)

**CREDIT UNIONS' JOINT OBJECTION TO THE REVISED PROPOSED FINDINGS
OF FACT AND CONCLUSIONS OF LAW FILED AT DOCKET NO. 19427**

TO THE HONORABLE COURT:

COME NOW, Cooperativa de Ahorro y Crédito Abraham Rosa, Cooperativa de Ahorro y Crédito de Ciales, Cooperativa de Ahorro y Crédito de Rincón, Cooperativa de Ahorro y Crédito Vega Alta, Cooperativa de Ahorro y Crédito Dr. Manuel Zeno Gandía, and Cooperativa de Ahorro y Crédito de Juana Díaz, through the undersigned attorneys, (hereinafter, “the Credit Unions”) and hereby jointly object to newly Proposed Findings of Fact and Conclusions of Law in Connection with Confirmation of the Modified Eighth Amended Title III Joint Plan of Adjustment of the

¹ The Debtors in these Title III Cases, along with each debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of federal Tax ID: 3481); (ii) Puerto Rico Sales tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Commonwealth of Puerto Rico, et al. [Docket No.19427] as submitted by the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”) as representative of the Commonwealth of Puerto Rico.

1. On November 28, 2021 the Oversight Board filed its Proposed Findings of Facts and Conclusions of Law in Connection with the Confirmation of the Modified Eight Amended Title III Joint Plan of Adjustment. Docket No. 19366.

2. On December 1st, 2021 the Credit Unions herein filed a joint objection to such proposed findings of facts and conclusions of law. Docket No. 19395.

3. On December 6, 2021 the Oversight Board filed revised Proposed Findings of Facts and Conclusions of Law. Docket No. 19427.

4. After carefully reviewing the revised Proposed Findings of Facts and Conclusions of Law submitted by the Oversight Board, the Credit Unions respectfully submit that the objections that were raised were not addressed. Therefore, the Credit Unions herein hereby object to the revised Proposed Findings of Facts and Conclusions of Law for the same reasons stated in their joint objection filed at Docket No. 19395, which are hereby adopted by reference as if fully transcribed herein.

WHEREFORE, the appearing Credit Unions respectfully request from this Honorable Court to consider, modify, add, and/or strike the Proposed Findings of Fact and Conclusions of Law submitted by the Oversight Board as objected and proposed in Docket No. 19395. Further, the appearing Credit Unions respectfully request from this Honorable Court that the Eight Title III Modified Plan of Adjustment as it currently stands in its latest version at Docket No. 19365 be denied, or in the alternative that this Honorable Court except from discharge their claims in the Order Confirming the Plan of Adjustment.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico this 8th day of December 2021.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, in accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's Fifteenth Amended Notice, Case Management and Administrative Procedures Order [ECF#17127] (the "CMP Order"), that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.



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